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# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91213584
Party	Plaintiff JAGUAR LAND ROVER LIMITED
Correspondence Address	Dorne McKinnon-Rybicki Brooks Kushman, P.C. 1000 Town Center22nd Floor Southfield, MI 48075 UNITED STATES gdavis@brookskushman.com, drybicki@brookskushman.com, mfangileri@brookskushman.com
Submission	Answer to Counterclaim
Filer's Name	Dorne J. McKinnon-Rybicki
Filer's e-mail	drybicki@brookskushman.com, gdavis@brookskushman.com
Signature	/dorne j. mckinnon-rybicki/
Date	01/22/2014
Attachments	Answer to Counterclaims LAND7344OC CLOUD ROVER.pdf(197415 bytes)

Serial No. **85867803** LAND 7344 OC

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Trademark Application

Serial No.: 85867803

Filed: March 5, 2013

Trademark: CLOUD ROVER

Atty. Docket No.: LAND 7344 OC

Published in the Official Gazette on July 23, 2013 on page TM 870

Jaguar Land Rover Limited,

Opposer,

Serial No. 85867803

v.

Opposition No. 91213584

Toys Tekk Corporation,

Applicant.

### **OPPOSER'S ANSWER TO COUNTERCLAIMS**

Opposer, Jaguar Land Rover Limited, a United Kingdom private company limited by shares (PRC), having a principal place of business at Abbey Road, Whitley, Coventry CV3 4LF, United Kingdom ("Opposer"), hereby answers the counterclaims asserted by Toys Tekk Corporation ("Applicant") in Applicant's Answer to the Notice of Opposition ("Answer").

- 1. Opposer denies the allegations contained in Paragraph 13 of Applicant's Answer.
- 2. Opposer denies the allegations contained in Paragraph 14 of Applicant's Answer.

WHEREFORE, Opposer respectfully requests that Applicant's Counterclaims be denied and that registration of the CLOUD ROVER mark, Application Serial No. 85867803, be refused and this opposition be sustained.

Serial No. **85867803** LAND 7344 OC

Respectfully submitted,

By: /dorne j. mckinnon-rybicki/ Dorne J. McKinnon-Rybicki

Attorneys/Agents for Opposer

Date: January 22, 2014

(Filed electronically via USPTO ESTTA)

### **BROOKS KUSHMAN P.C.**

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Phone: 248-358-4400 Fax: 248-358-3351 Serial No. **85867803** LAND 7344 OC

## **CERTIFICATE OF SERVICE**

I certify that I served:

#### **OPPOSER'S ANSWER TO COUNTERCLAIMS**

On January 22, 2014 by First Class Mail to:

Shun C. Chen LAW OFFICES OF SHUN C. CHEN 4521 Campus Dr # 324 Irvine, CA 92612-2621

Courtesy copy via email to: shunchen@att.net

Correspondent for Applicant

/melissa arab/ Melissa Arab